

EX PARTE OR LATE FILED

SNET

Southern New England Telephone
310 Orange Street
New Haven, Connecticut 06510
Tel 203. 771.8514
Fax 203. 624.3549
Email wendy.bluemling@SNET.com

Wendy Bluemling
Director - Regulatory Affairs

December 2, 1998

EX PARTE

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

DEC - 3 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 96-128

Dear Ms. Salas:

The Southern New England Telephone Company (SNET) is filing this letter to notify the Federal Communications Commission (Commission) of certain problems arising from the installation of Flex ANI in its switches. In its Memorandum Opinion and Order (Order) released October 1, 1998, the Commission granted SNET an extension until October 31, 1998, to provide payphone-specific coding digits. This letter identifies the technical problems that have arisen in SNET's deployment of Flex ANI.

To comply with the Commission's Order, SNET began installing Flex ANI in its end offices beginning in the first quarter of 1998. Upon testing the feature earlier this year, SNET discovered that both LUCENT and Nortel, the manufacturers of SNET's switches, designed their Flex ANI features based on the SSP function being performed at the end office. SNET's toll free architecture is unique in that it utilizes IN SSP functionality for 800 services and AIN functionality for 888 and 877 services at the access tandem level. Therefore, SNET's access tandems cannot provide post-query screening to determine if Flex ANI should be delivered to a specific carrier. Because of this problem, SNET negotiated with its switch vendors to develop a tandem enhancement. Nortel advised SNET that it could provide its enhancement by December 31, 1998. LUCENT advised SNET that a tandem enhancement could not be provided until the end of the first quarter of 1999. However, because SNET's compliance obligations required capabilities by year end 1998, SNET negotiated a lease arrangement to equip all of its LUCENT end offices with the SSP IN 800 functionality until LUCENT develops and installs the tandem enhancement.

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Significant additional translations and testing were required to deploy the SSP functionality to LUCENT offices. This work began in August, immediately following the completion of leasing arrangements with the vendor. However work efforts were delayed due to the union work stoppage in Connecticut and the need to complete a significant work effort to implement FGD CIC expansion. Work resumed after the strike to meet the Commission's required date of October 31, 1998, but further testing of the Flex ANI capabilities has uncovered additional problems.

First, Flex ANI is not operational for 888 and 877 calls made from 5ESS end offices, because of SNET's utilization of an AIN platform versus an IN platform for 888 and 877 services. While this problem affects an estimated 8-10% of payphone calls, it also affects all 5ESS offices. SNET has made arrangements with LUCENT to lease the IN 888 and 877 feature in all of its 5E end offices not served by the Hartford Nortel tandem. This problem should be resolved in all of these LUCENT 5E offices within a week to ten days. The problems in the 5E end offices served by the Hartford tandem will be resolved upon installation of the new Nortel tandem screening feature anticipated by December 31, 1998.

Second, six 1AESS offices require generic upgrades to support the Flex ANI feature. These offices represent approximately 16% of payphone lines. SNET is negotiating with the vendor to advance the scheduled upgrades and complete Flex ANI installation by the end of this year for four of the six offices, representing 9.2% payphone lines. Two of these offices are scheduled for digital switch replacements in July and September 1999. SNET will be seeking a waiver from the Commission to defer Flex ANI implementation until the switch replacements are completed. Finally, there are two offices, Wilton and New Canaan, that will have Flex ANI available when the LUCENT tandem enhancement is available. These offices are anticipated to be Flex ANI capable by May, 1999.

With the work described above, 71 % of SNET's smart payphone lines will be Flex ANI capable after the LUCENT 5E end office enhancement is completed. By the end of December, 1998, with the installation of the Nortel tandem feature enhancement and with the advance of 1AESS generic upgrades, over 90% of SNET smart payphone lines should be Flex ANI capable.

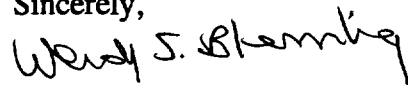
SNET is continuing to work with its switch vendors to address issues that can be resolved to address the Commission's Order to provide payphone specific coding digits. However, one remaining issue that affects a small percentage of payphone calls is where SNET performs the 800/POTS translations. Both of SNET's vendors informed SNET that a remedy will not be available until the second quarter of 1999. SNET will

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be filing a petition for waiver of the December 31, 1998, compliance date with the Commission in the next two weeks. SNET's petition will outline in more detail the problems that remain with the implementation of Flex ANI.

SNET hereby files this Ex Parte in accordance with the Rules of the Commission, 47 C.F.R. Section 1.1206(b)(1).

Sincerely,

A handwritten signature in black ink, appearing to read "Wendy S. Bluemling". The signature is written in a cursive, flowing style.

Wendy S. Bluemling

Copy to: Mr. Glenn Reynolds, Mr. L. Strickling, Chief, Common Carrier Bureau